

William H. Taylor, Jr., Chief Enforcement Section (6AW-HE) United States Environmental Protection Agency Region VI Interfirst Two Building 1201 Elm Street Dallas, Texas 75270

Re: EPA's Investigation of Turner Brothers Trucking Co.

Dear Mr. Taylor:

The telephone conversations with David Cohen 12-23-85 and 1-2-86 regarding the situation at Turner Brothers Pipe Storage Company which is located north and east of the ten acres on which we live still does not answer the question of how the EPA can come to any conclusion on the extent or amount of the damages created by the procedures used to clean and preserve the pipe if the inspection was made only on the land used by that company. No one from the EPA has investigated what is happening where the overflow from the ponds which catch the run-off from that land enters the spring area and the creek which flows west across our property.

The Oklahoma Water Resources Board apparently has not been concerned with what is oozing from the ground in the spring area (dark orange spongey material with a rainbow colored film on the surface) and is now in the creek; nor does anyone express concern that the rock is changing colors (blood red, orange, yellow) and turning to sand. As I watch the rock on our land making such changes in such a short time, it makes me become more concerned with injection wells where certain waste products are considered to be safely disposed of because of the "rock formation". The changes on our land first became visible to us in June 1982. Each time there is a hard rain or the pond overflows, the "sand" is washed away and into the creek which eventually enters Chisholm Creek, then Cottonwood Creek, and then the Cimmarron River. Then the procedures starts all over again -- the rock begins to curl and turn to sand. There is a difference between chemical erosion and that done just by running water. What is going to happen when other waste products enter these same creeks and combine to form new substances? What can our government do to protect the people from this unknown?

According to Mr. Cohen, Gary Ritzky reported that he never heard from us regarding what is happening. In my opinion, Mr. Ritzky should have been aware of what was happening due to his own inspections at the site where it originated. Other companies try to clean up after themselves and to protect the environment. Why not Turner Brothers? Being a registered nurse gave me the logic of going directly to the Health Department when I saw a foreign substance in the pond and the horses would not drink the water in June 1982. It also caused great concern regarding the well water which we drink. The Health Department sent me to the Corporation Commission who immediately

discarded the samples I had gathered and sent a person from their own office in Kingfisher to collect samples. The Corporation Commission then referred the problem to the Oklahoma Water Resources Board. Copies of most of the letters and reports received by me had also been sent to Gary Ritzky of Turner Brothers so he was kept informed by qualified people.

Another question which remains unanswered is what happened to the transformers which were noted in the inspection report (WR-82-907 Re WR-82-619) after the dump was burned and then buried? At the hearing of April 11, 1985 which was taped, I also reminded Gary Ritzky that he and "Wayne" had been given permission to come on our land in the area where the pond overflows to investigate what is happening at any time. Both of them had been on our land when the wood debris was having to be removed. To this date no one from Turner Brothers has checked what is happening where the pond overflow enters the springs and creek. After the OWRB came out to check the debris in the pond area the last of July 1985. Turner Brothers placed "No Trespassing" signs all around on their land. They did not clean up the wood debris nor correct the damage that is being done, on our land.

At the OWRB meeting on June 11, 1985 when the discharge permit was granted, I again asked about the transformers. Mr. Ritzky said he didn't know anything about any transformers. Later during a telephone conversation with Tom Maiello (OWRB) who had made the inspection at Turner Brothers, Tom stated that they were "new" transformers. His inspection report did not call them "new" transformers. My great concern is still that the dump was burned and then buried and that no one knows what was in that dump.

Enclosed are pictures and samples of the rock deterioration collected January 12, 1986. The situation has become so much worse in such a short time that it deepens my concern with the environment in other areas where the same changes could be occurring without anyone noticing. I am also enclosing a copy of a letter received from an attorney (his name is deleleted) which clearly states the reason we have not taken our problem to court -- lack of money and lack of time. In other words we wouldn't live long enough to get the suit settled.

The Oklahoma Water Resources Board is in the process of amending the 1985 Oklahoma Water Quality Standards. Unfortunately some of the cities in ACOG are objecting to some of the changes due to the costs to the cities. Those objecting are not giving thought to the cost of future law suits where cities sue cities because of what is being dumped in their "back yards". In the long run, prevention of pollution would be cheaper than cleaning up the damage which could be done.

This does not begin to tell the whole story, but I have more time to write than you have time to read. Please listen to the people who live in the area where changes take place. They may not be "qualified" in some people's mind, but they are in a position to observe what is happening on a day to day basis. Your help in stopping and correcting what is occurring will be greatly appreciated. The orange material and the deteriorating rocks are now on the land west of our property.

Dorothy V. Smith

(Mrs. Richard C. Smith Edmond, Oklahoma 73034

Sincerely, Dorochy C. Smith

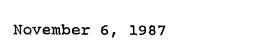
Phone: 405/341-2268

copy of letter to mr. Cohen Enc.

***EOBERTS/SCHORNICK & ASSOCIATES, INC.

Environmental Consultants

II.A. 4



M.S. Environmental Protection Agency Region VI 1445 Ross Ave.

Dallas, TX 75202-2711

Attention: Ms. Karen Bond 6H-HS

OKO104 450 524

RE: Turner Brothers Trucking Company, Inc., Edmond, OK

Dear Ms. Bond:

Please find attached a copy of a report prepared for the Turner Brothers Trucking Company, Inc. (Turner) facility in Edmond, OK entitled, "Rack Subarea Clean Zone Identification Sampling and Analysis Report." This report, as well as the RCRA Closure Plan prepared for the facility, have been approved by the Oklahoma State Department of Health (OSDH) and according to Mr. John Everett of OSDH, Turner need not seek further approval from EPA. The attached report is submitted for your information at the request of Mr. Everett.

If you have any questions or require additional information, please don't hesitate to call me at (405) 321-3895.

Sincerely,

Werschel Roberts

HR/ch

Attachment

cc: Mr. John Everett Mr. Garry Ritzky

RACK SUBAREA CLEAN ZONE IDENTIFICATION SAMPLING AND ANALYSIS REPORT

Turner Brothers Trucking Company, Inc.

OKD 104 850 524 II. A.4

Prepared by Roberts/Schornick & Associates, Inc.

October, 1987

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Figures: (Sketches of Affected Rack Areas Depicting Clean Zone Identification Sampling Grid Systems)

Exhibit 1: Analytical Data Sheets

Exhibit 2: Chain of Custody Documentation

RACK SUBAREA (CLEAN ZONE IDENTIFICATION SAMPLING AND ANALYSIS REPORT

TURNER BROTHERS TRUCKING COMPANY, INC.

1.0 <u>INTRODUCTION</u>

As indicated in the closure plan (4), clean perimeter boundaries have been established for each rack area at the Turner Brothers Trucking Company, Inc. (TBTC) facility subject to closure. These boundaries at the nine (9) rack areas were defined in accordance with the sampling plan (2).

The approved procedure was repeated at all nine (9) rack areas until clean perimeters were established based on trench sample analytical results. All soil within these perimeters to a depth of six (6) inches is subject to closure decontamination and disposal operations, unless, TBTC demonstrates subareas to be clean by further testing as optionally allowed in the sampling plan (2). The nine rack area clean perimeter boundaries contain a total of 3500 cubic yards of soil subject to closure. A breakdown by area is presented in Table 1 of the closure plan (4).

It was estimated that up to 1000 cubic yards of the 3500 total cubic yards of soil in subareas of these nine (9) areas may be clean. The pipe cleaning process, which has been previously described, is such that the soil beneath the pipe ends is more likely to be contaminated than soil between parallel racks, unless this soil has been affected by runoff from upgradient contaminated areas. OSDH has agreed

that through dditional testing these of an subarea zones be identified (3,7). This document presents the specific procedures which were used to delineating clean subarea zones and summarizes the analytical results.

For the subareas delineated herein to be uncontaminated by the approved testing procedures described herein, TBTC requests OSDH review and approval that these subareas, are not subject to any closure remediation activities.

2.0 SAMPLING METHODS FOR CLEAN SUBAREA ZONE IDENTIFICATION

Two (2) types of sampling methods were used in collection of samples for analysis in the clean subarea zone identification process at the TBTC facility. One method consisted of composite sampling from a trench, approximately twenty to twenty-five feet in length, cut diagonally across a square or rectangular subarea which has been measured, staked, and recorded within the established perimeter of a rack area. This composite sample was considered to be representative of the soil in the rectangular subarea. The trench was cut and sampled as described in the approved sampling plan (2) and sampling plan implementation report (1). This trench sampling method is in agreement with the approved sampling plan (2).

The other st pling method involved the livision of larger potentially clean zones within a rack area into grids and random selection of approximately 25% of these grids for sampling. This method was applicable to large areas at two (2) racks for which previous operation procedures and previous sampling and analyses results indicated the entire areas to likely not be contaminated. The grid sampling point was defined to be the grid center or nearest accessible point. At the grid sampling point a six (6) inch deep hole was dug and a composite sample taken from the side wall of the hole from 0-6 inches. A statistical analysis at the 80% confidence level was to be performed on the test data for these randomly selected samples to determine the contamination status of the entire grid zone if any of the samples were to contain total lead at a concentration above the agreed to regulatory closure concentration of 800 PPM. This procedure is in keeping with SW-846 (5) and the intent of the sampling plan (2).

Data obtained previously indicated that one of the nine (9) rack areas (H & P Area) did not likely contain contaminated soil. TBTC utilized the random grid selection sampling method to determine if this entire rack area could be excluded from closure activities. A sketch of this area depicting the grid sampling system is provided as Figure 5. Bullets, "•" denote the randomly selected sample grids.

Both methods of testing were employed (the West Test rack area. A sketch of the West Test rack area depicting the use of both sampling methods is attached as Figure 9. Zones or alleys between the individual racks were sampled by random selection of grids, as indicated on the sketch. Potential sample grids for this method of sampling are marked by a grid number and the letter "T" on the figure. Randomly selected grids are noted by a bullet "•" on the figure, as indicated previously. Areas outside these alleys, but within the perimeter of the rack area, were sampled using the diagonal trench method within each established grid as shown on the sketch.

3.0 SOIL CONTAMINATION CRITERIA

As stated in the sampling plan (2), a concentration of 800 mg/kg total lead has been accepted (2, 3) as the regulatory threshold for purposes of closure contamination boundary assessment. The closure plan (4) describes a final closure testing procedure whereby lead EP Toxicity will be evaluated at each rack area subjected to closure management operations. For the subareas delineated to be uncontaminated by the testing described herein, pending OSDH review, there will be no further closure requirements.

4.0 ANALYTICAL METHODS

Total lead was analyzed in all samples by Method 7420 as described in SW-846 (5). The analyses were performed by Environmental Control Laboratory, Inc., in Norman, Oklahoma.

5.0 QA/QC

Strict adherence to the sample collection and handling procedures described in the Rack Subarea Clean Zone Identification Sampling and Analysis Methods submittal (7) and the Site Sampling and Analysis Plan (2) was observed at all times. Chain of Custody sheets (Exhibit 2) were completed for each set of samples collected and transmitted to the laboratory. All samples were taken to the laboratory by RSA personnel.

The laboratory utilizes an internal quality control program in which at least 10% of all samples are analyzed in duplicate. In addition, RSA submitted blind duplicate samples which are identified on the analytical summary tables. These samples provide a check on the variation of analytical results associated with sample splitting procedures. The sampled soils ranged from clay to gravel and rock.

Analytical data sheets are provided in Exhibit 1.

6.0 SAMPLING PLAN IMPLEMENTATION

Initial review of all available analytical data from previous sampling events was accomplished during May, 1987, for the purpose of selecting sample sites for clean zone identification testing. TBTC provided information regarding

operational ractices which suppleme ted the analytical data. A field reconnaissance was made to stake areas for sampling which began on June 29, 1987.

Specific comments regarding sampling at each rack area are provided in Subsections 6.1 through 6.9.

6.1 Mustang Rack Area

Figure 7 shows the areas designated for clean zone identification sampling in the Mustang Rack Area. The areas are labeled 1T through 10T. The selected areas were sampled on July 14, 1987 and September 3, 1987. The diagonal trench sampling method described previously in this report was utilized at this rack area.

6.2 West Test Rack Area

Figure 9 shows the areas designated for clean zone identification sampling for the West Test Rack Area. The areas are labeled 1T through 66T and 1G through 33G. Both diagonal trench samples and randomly selected grid samples, described previously in this report, were collected at this rack area. The area was sampled on June 29 and June 30, 1987 and July 6-9, 1987.

6.3 North Test Rack Area

The North Test Rack Area was not selected for clean zone identification sampling.

6.4 Kerr Mc 'e Rack Area

The Kerr McGee Rack Area was not selected for clean zone identification sampling.

6.5 <u>H & P Rack Area</u>

Figure 5 shows the entire H & P Rack Area was designated for clean zone identification sampling. The entire area was sectioned into grids as shown in Figure 5. The grid squares are labeled 1G through 24G. The samples collected were random selection grid samples described previously in this report. The samples were collected on July 14, 1987.

6.6 Sooner Rack Area

Figure 4 shows the areas designated for clean zone identification sampling in the Sooner Rack Area. The areas are labeled 1T through 8T. The samples were collected by the diagonal trench method previously described on July 14, 1987.

6.7 PA Building Rack Area

The PA Building Rack Area was not selected for clean zone identification sampling.

6.8 Pipe Cleaning (PC) Rack Area

Figure 3 shows the areas designated for clean zone identification sampling in the Pipe Cleaning Rack Area. The

areas are 1 eled 1T through 20T. I samples were collected on August 7, 1987 by the diagonal trench method previously described.

6.9 AMF Rack Area

Figure 2 shows the areas designated for clean zone identification sampling in the AMF Rack Area. The areas are labeled 1T through 4T. The diagonal trench method previously described was utilized. Samples were collected on August 7, 1987.

7.0 SUMMARY OF ANALYTICAL RESULTS

Analytical data sheets are provided in Exhibit 1 and the Chain of Custody documentation is provided in Exhibit 2. The data are presented in Tables 1 through 6 for the areas which under went clean zone identification testing. The samples with concentrations of total lead ≥ 800 mg/kg, which is the closure plan regulatory threshold, are so noted on each table in the last column. The diagonal trench samples not exceeding the 800 mg/kg threshold are designated as representing clean areas and are not subject to further closure requirements.

No samples taken by the randomly selected grid method exceeded the 800 mg/kg threshold limit for total lead. Table 8 summarizes the statistical analysis of the data for the samples from the four (4) grid areas sampled (Grid Area 1 - H & P Test Rack Area, Grid Areas 2, 3 and 4 - West Test

Rack Area). The means and ranges at < 800 mg/kg total lead. Therefore, all four (4) of these areas are determined to be clean, based on the approval criteria. Nor further statistical analysis of the data is necessary.

The sample sites which yielded results above the regulatory threshold limit are also noted on the rack area figures by hash marking.

The findings and conclusion of the clean zone identification testing results are as follows:

- 1. The volume of contaminated soil estimated for closure management is reduced from about 3500 cubic yards to less than 2200 cubic yards. A table which summarizes the volume estimate calculations for each rack area is proved in Table 7.
- 2. One entire area (H & P Rack ARea) and the eastern onehalf of an area (Pipe Clean Rack Area) has been eliminated from closure management requirements.
- 3. A significant area within the West Test Rack Area is determined to be uncontaminated for purposes of closure.
- 4. Some or all of the alleys between the concrete pipe racks in each area tested have been determined to be uncontaminated for purposes of closure.

REFERENCES

- 1. Turner Brothers Trucking Company RCRA Closure Sampling Plan Implementation Report; Roberts/Schornick and Associates, Inc., March 1987.
- 2. Turner Brothers Site Sampling and Analysis Plan; Roberts/Schornick and Associates and James L. Grant and Associates, Inc. June, 1986.
- 3. Correspondence approving Sampling and Analysis Plan; from Mr. Jeff Pursley, Environmental Engineer, Oklahoma State Department of Health, Industrial Waste Division to Mr. Brian Burgess, U.S. Environmental Protection Agency; October 15, 1986.
- 4. Turner Brothers Trucking Company, Inc. RCRA Closure Plan, Edmond Pipe Yard Facility; Roberts/Schornick and Associates, Inc.; May, 1987.
- 5. Test Methods for Evaluating Solid Waste, Physical and Chemical Methods; SW-846; U.S. Environmental Protection Agency; 1984.
- 6. Rack Subarea Clean Zone Identification Sampling and Analysis Methods Submittal; prepared for TBTC by RSA; submitted to OSDH for review and approval; May, 1987.
- 7. Correspondence approving Rack Subarea Clean Zone Identification Sampling and Analysis Methods submittal; from Mr. Jeff Pursley, Environmental Engineer, Oklahoma State Department of Health, Industrial Waste Division, to Mr. Garry Ritzky, Turner Brothers Trucking Company, Inc., with copy to Mr. Brian Burgess, U.S. Environmental Protection Agency; June 30, 1987.

TABLES

CLEAN ZONE SAMPLING

FOR

WEST TEST

	*****	1231	
RSA SAMPLE ID	ECL SAMPLE ID	TOTAL LEAD (NG/KG)	SAMPLES 2 800 MG/KG
WT1T	2184	142.5	
WT2T	2185	205.5	
WT3T WT4T	2240 2241	65.0 195.0	
WTST	2243	523.0	
WT6T WT7T	2244 2245	87.0 890.0	x
WT8T	2246	1810.0	x
WT9T	2247 2248	90.0 143.0	
WTIOT WTIIT	2249	37.0	
WT12T	2180	776.2	
WT13T WT14T	2262 2263	714.0 263.0	
WT15T	2251	2810.0	X
WT16T WT17T	2252 2253	392.0 106.0	
WT18T	2254	218.0	
WT19T	2255 2256	380.0 32.0	
WT2OT WT21T	2183	510.0	
WT22T	2257	50.0	
WT23T WT24T	2264 2265	1380.0 790.0	Х
WT25T	2242	823.0	X
WT26T WT27T	2258 2181	1570.0 340.5	Х
WT28T	2259	68.0	
WT29T	2182	95.5	
WT3OT WT31T	2260 2261	350.0 701.0	
¥T32T	2266	2490.0	x
WT33T WT34T	2267 2268	81.0 261.0	
#T35T	2269.	2580.0	Х
WT36T	2186	307.5	v
WT37T WT38T	2270 2271	1200.0 804.0	X X
WT39T	2272	130.0	
WT4OT WT41T	2187 2277	56.5 407.0	
WT42T	2278	269.0	
WT43T WT44T	227 9 2280	447.0 373.0	
WT45T	2273	570.0	
WT46T	2274	2640.0	X
WT47T WT48T	2275 2276	993.0 2760.0	X X
WT49T	2301	469.0	
WT5OT WT51T	2302 2303	23.0 833.0	x
WT52T	2281	279.0	
WTS3T WT54T	2282 2188	485. 0 423. 0	
WTSST	2283	83.0	
WTS6T	2284	562. 0 769. 0	
WT57T WT58T	2285 2286	253.0	
WT59T	2287	273.0	
703TW	2288 2289	501.0 307.0	
WT62T	2290	275.0	
WT63T WT64T	2291 2292	571.0 349.0	
WT65T	2293	1293.0	, х
WT66T	2294	355.0	
WT2G	2295	13.7	
WT3G WT7G	2296 2297	7.1 248.0	
WT 14G	2298	76.0	
WT16G WT22G	2300 2299	11.0 12.0	
WT246	2196	287.0	
WT286 WT306	2197 2198	57. 5 4 9. 0	
		-23	

TABLE 2

CLEAN ZONE SAMPLING

- FOR

SOONER TEST AREA

		SAMPLE	TOTAL LEAD (MG/KG)	≥ 800
	SIT	2449	2432.0	х
	S2T	2448	1402.0	x
	S3T	2447	1192.0	х
	S4T	2353	596.0	
•	S5T	2352	461.0	
;:	S6T	2355	1040.0	х
	S7T	2450	358.0	
	SBT	2354	173.0	
×	DS1T	2356	993.0	Х

 $_{\pm}$ DUPLICATE SAMPLES SPLIT IN THE FIELD

TABLE 3
CLEAN ZONE SAMPLING

FOR

MUSTANG TEST AREA

SAMPLE ID	SAMPLE ID	TOTAL LEAD (MG/KG)	MG/KG
M1T	2443	118.0	
M2T	2442	247.0	
TEM	2827	670.0	
M4T	2828	660.0	
M5T	2446	179.0	
Met	2445	165.0	
M7T	2444	358.0	
MBT	2457	638.0	
мэт	2829	550.0	
MIOT		505.0	

TABLE 4
CLEAN ZONE SAMPLING

FOR

H&P TEST AREA

RSA SAMPLE ID	ECL SAMPLE ID	TOTAL LEAD (MG/KG)	SAMPLES 2 800 MG/KG
HP1G	2453	70.0	·
HP4G	2452	72.0	
HP11G	2451	54.0	
HP15G	2454	5.0	
HP20G	2455	202.0	
HP23G	2456	1.5	

TABLE 5

CLEAN ZONE SAMPLING

FOR

PIPE CLEANING RACK

ID	SAMPLE	TOTAL LEAD (MG/KG)	≥ 800
PC1T		260.0	
PC2T		242.0	
PC3T		70.0	
PC4T		294.0	
PC5T		526.0	
PC6T		170.0	
PC7T		256.0	
PC8T		165.0	
PC9T		734.0	
PC10T		582.0	
PC11T		269.0	
PC12T		403.0	
PC13T		362.0	
PC14T		316.0	
PC15T		267.0	
PC16T		278.0	
PC17T		230.0	
PC18T		213.0	
PC19T		280.0	
PC20T		286.0	

TABLE 6

.CLEAN ZONE SAMPLING

FOR

AMF BUILDING AREA

	RSA SAMPLE ID	SAMPLE	TOTAL LEAD (MG/KG)	2 800
	AMF1T		891.0	Х
(1)	AMFBD1		985.0	Х
	AMF2T		609.0	
(2)	AMFBD2		424.0	
	AMF3T		617.0	
(3)	AMFBD3		622.0	
	AMF4T		446.0	
(4)	AMFBD4		516.0	

⁽¹⁾ DUPLICATE OF AMF1T SPLIT IN THE FIELD

⁽²⁾ DUPLICATE OF AMF2T SPLIT IN THE FIELD

⁽³⁾ DUPLICATE OF AMF3T SPLIT IN THE FIELD

⁽⁴⁾ DUPLICATE OF AMF4T SPLIT IN THE FIELD

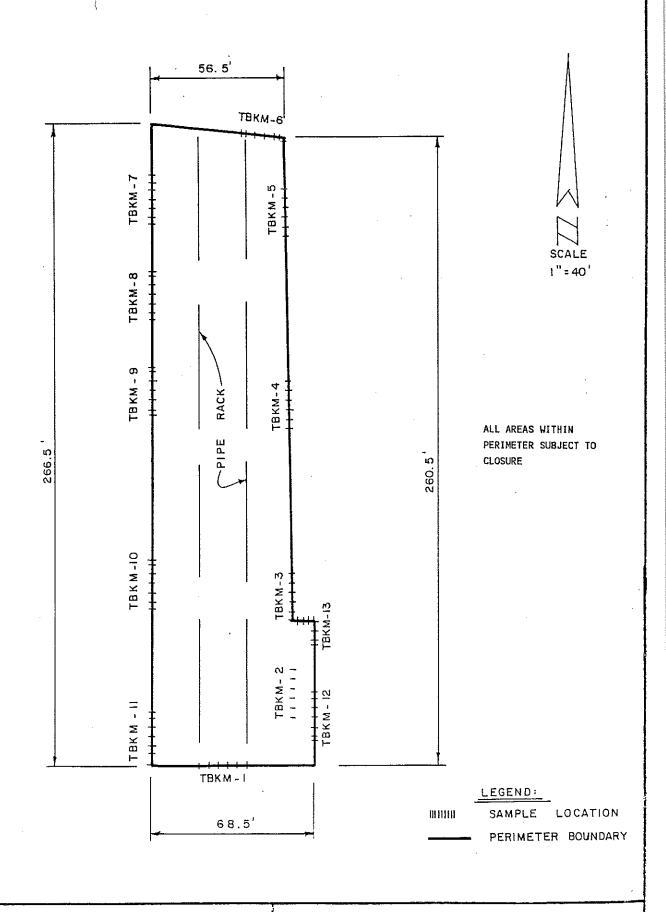
TURNER BROTHERS ESTIMATED SOIL VOLUME WITHIN CLEAN BOUNDARIES*				
SITE	AREA (SQ.YARDS)	VOLUME (CUBIC YARDS)		
North Test	, 5,050.33	841.72		
West Test	756.00	126.00		
HP Test	0	О		
Sooner Test	1,497.48	249.58		
Kerr McGee	1,761.78	293.63		
Mustang	1,266.00	211.00		
PA Building	644.44	107.43		
Pipe Cleaning Rack	1,238.40	206.40		
AMF Building	714.00	119.00		
TOTAL	12,928.43 yards ²	2,154.76 yards ³		

^{*} Soil Depth = 6" or .5'

TABLE 8
GRID AREA TEST RESULTS

NO.	MAXIMUM (MG/KG)	MINIMUM (MG/KG)	MEAN (MG/KG)
6	202	-1.5	67.42
3	248.1	7.1	89.6
3	76	11	33
3	287	49	131.17
	6 3 3	(MG/KG) 6 202 3 248.1 3 76	(MG/KG) (MG/KG) 6 202 1.5 3 248.1 7.1 3 76 11

FIGURES Sketches of Affected Rack Areas

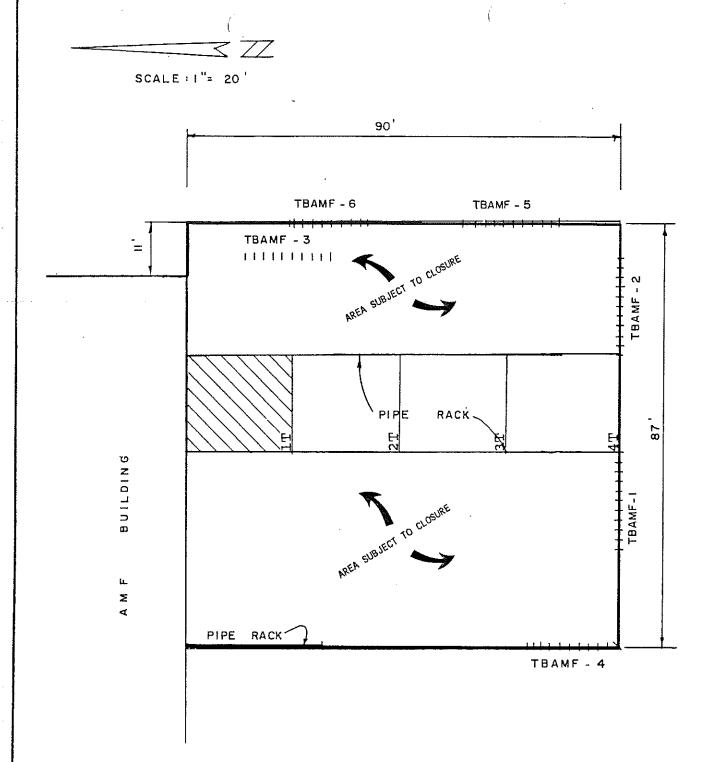


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& ASSOCIATES, INC.

860 Copperfield Drive, Suite A. Norman, Oklahoma 73072

FIGURE I SAMPLING LOCATIONS KERR McGEE TEST AREA



LEGEND

| | | | = SAMPLE LOCATION

--- = PERIMETER BOUNDARY

//// = TOTAL LEAD CONC. ≥ 800 MG/KG

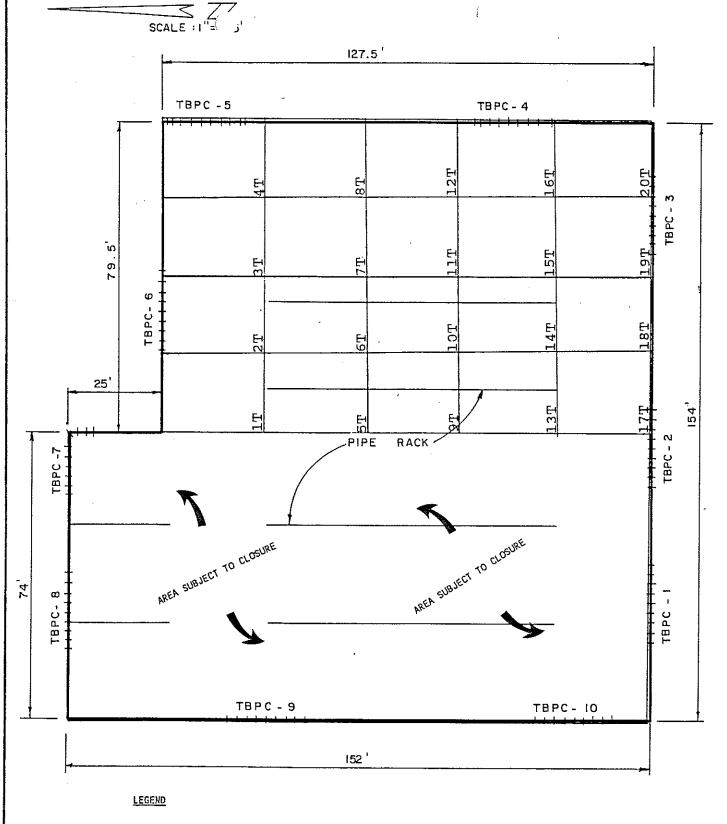
AND SUBJECT TO CLOSURE

T = DIAGONAL TRENCH SAMPLE SQUARE DESIGNATION

ROBERTS/SCHORNICK & ASSOCIATES, INC.

860 Copperfield Drive, Suite A. Norman, Oklahoma 73072

FIGURE 2
SAMPLING LOCATIONS
AMF BUILDING AREA



|||| = SAMPLE LOCATION

= PERIMETER BOUNDARY

//// = TOTAL LEAD CONC. ≥ 800 MG/KG

AND SUBJECT TO CLOSURE

T = DIAGONAL TRENCH SAMPLE SQUARE DESIGNATION

ROBERTS/SCHORNICK

& ASSOCIATES, INC.

860 Copperfield Drive, Suite A. Norman, Oklahoma 73072

FIGURE 3
SAMPLING LOCATIONS
PIPE CLEANING RACK

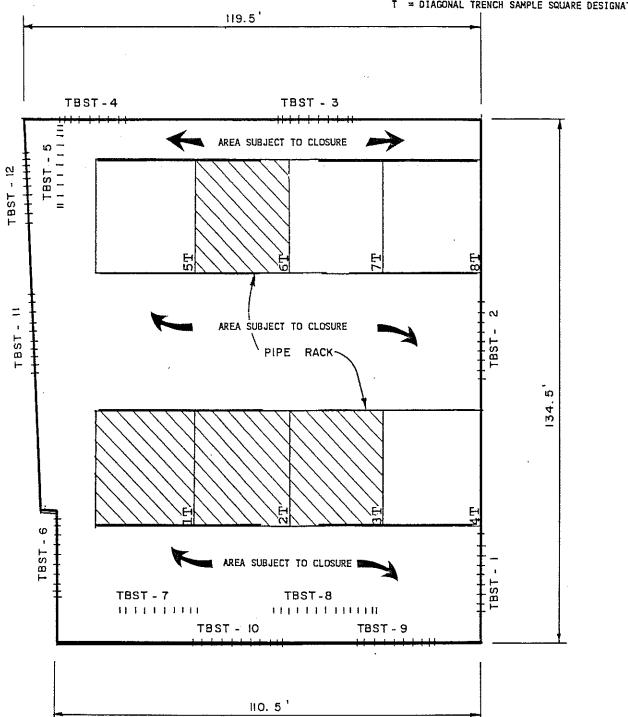
SCALE: 1"= 25 '

| | | = SAMPLE LOCATION - = PERIMETER BOUNDARY

//// = TOTAL LEAD CONC. > 800 MG/KG

AND SUBJECT TO CLOSURE

T = DIAGONAL TRENCH SAMPLE SQUARE DESIGNATION

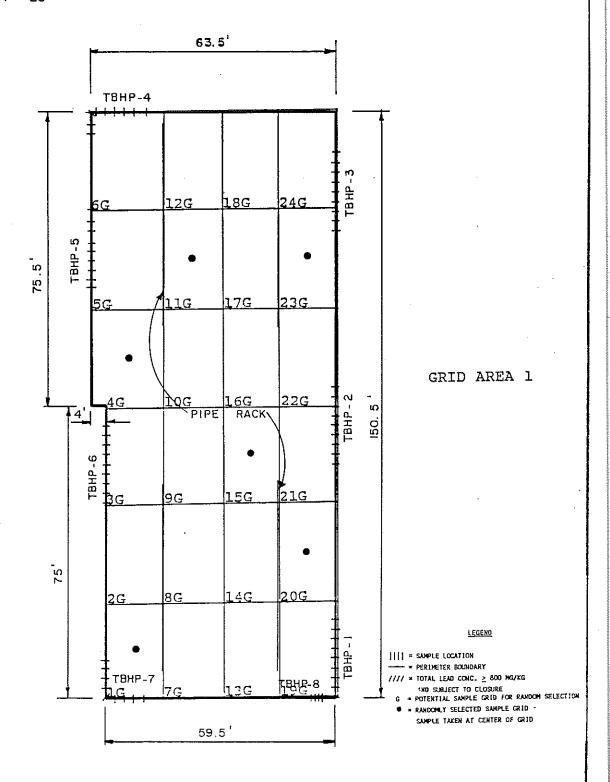


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FIGURE 4 SAMPLING LOCATIONS SOONER TEST AREA

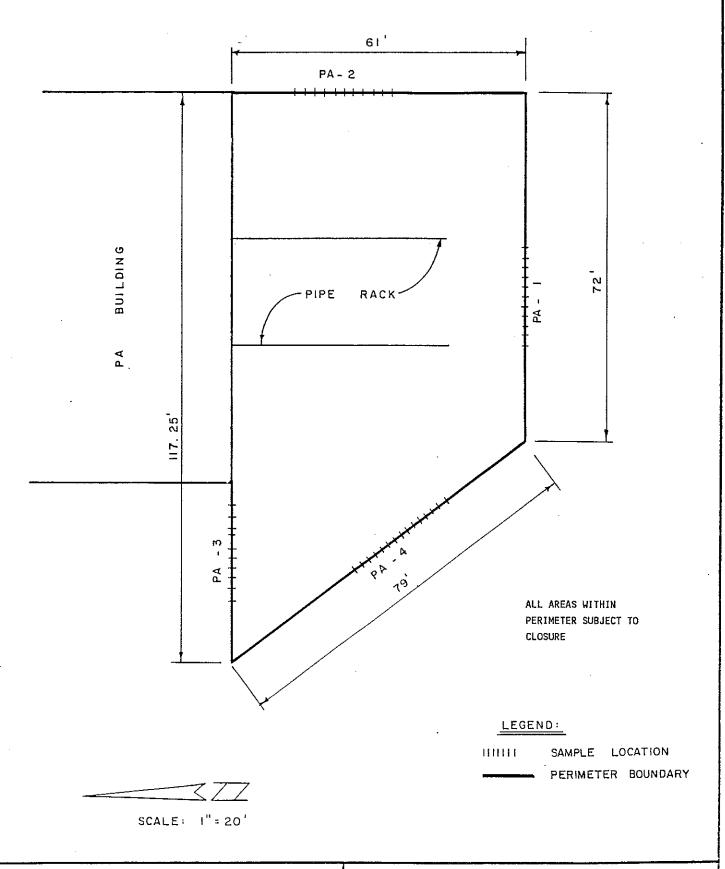
SCALE: 1"= 25"



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& ASSOCIATES, INC.

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FIGURE 5
SAMPLING LOCATIONS
H & P TEST AREA

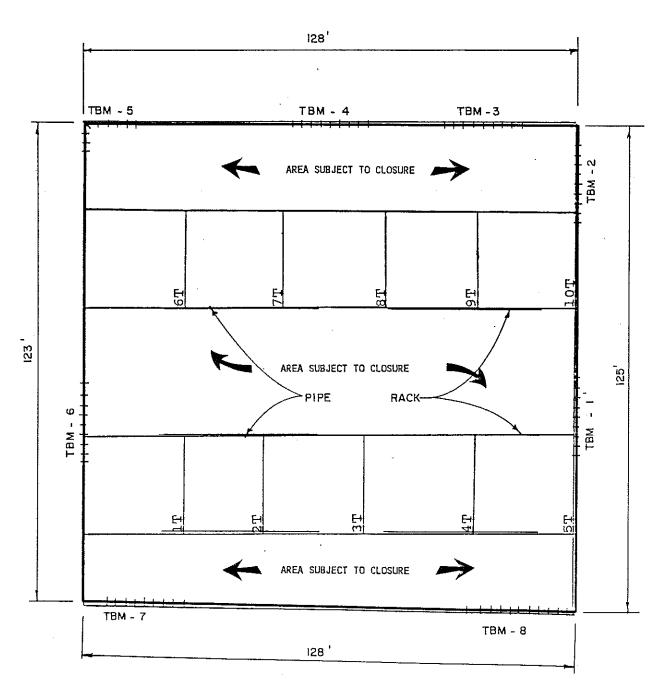


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FIGURE 6
SAMPLING LOCATIONS
PA BUILDING AREA

SCALE 1"= 25"



LEGEND:

IIIIII SAMPLE LOCATION

PERIMETER BOUNDARY

/ / / TOTAL LEAD CONC. ≥ 800 MG/KG

ROBERTS/SCHORNICK

& ASSOCIATES, INC.

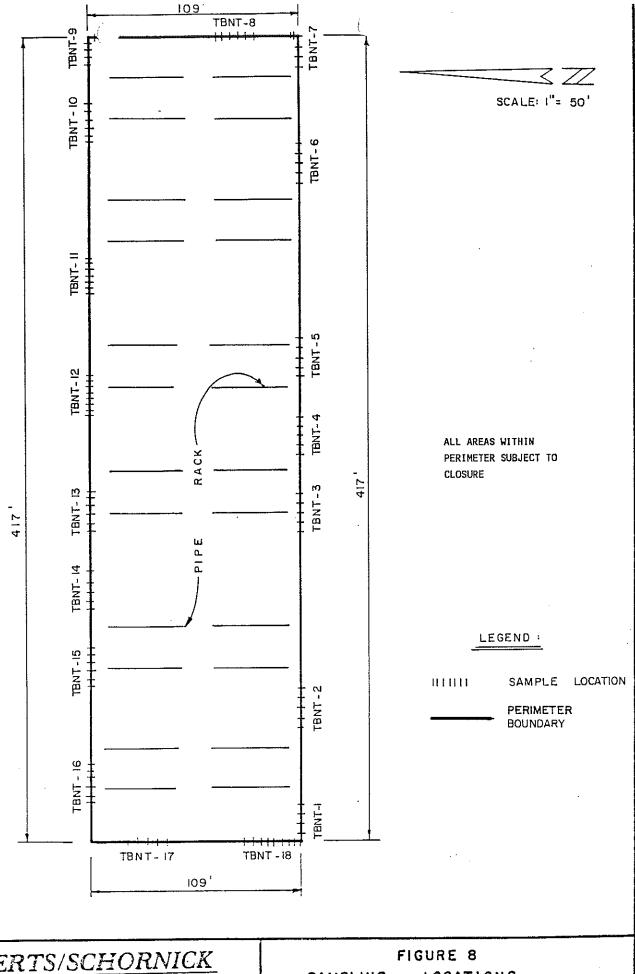
860 Copperfield Drive, Suite A. Norman, Oklahoma 78072

FIGURE 7

SAMPLING MUSTANG

LOCATIONS

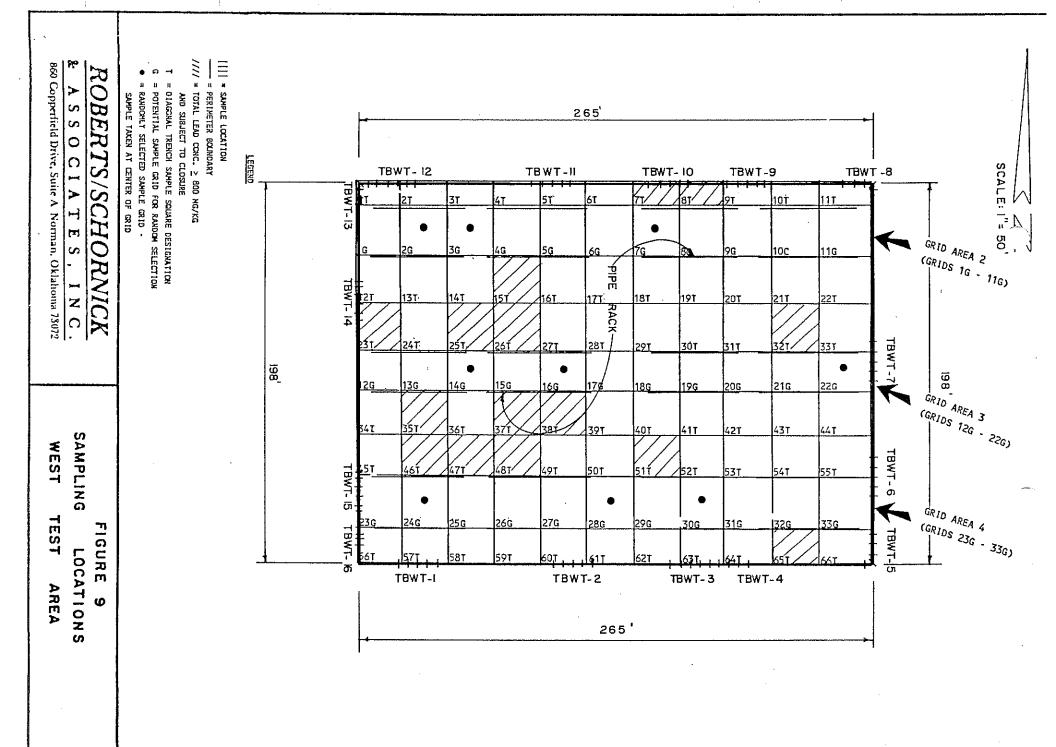
TEST AREA



ROBERTS/SCHORNICK & ASSOCIATES, INC.

860 Coppertield Drive, Suite A. Norman, Oklahoma 73072

FIGURE 8
SAMPLING LOCATIONS
NORTH TEST AREA



EXHIBITS

EXHIBIT 1 Analytical Data Sheets



ENVIRONMENTAL CONTROL LABORATORY, INC.



P.O. BOX 274 • NORMAN, OKLAHOMA 73070 • (405) 364-4282

PROJECT

PETROPHYSICAL DATA, LTD. PROJECT NO. SUB FILE NO.

September 10, 1987

Mark Fuchs
Roberts/Schornick & Associates
860 Copperfield Drive, Suite A
Norman, Oklahoma 73072

Dear Mr. Fuchs:

The following are test results for samples submitted to our laboratory for analysis on 09/03/87:

Laboratory Log # 1729

Turner Brothers Trucking Co.

Sample Number: #2827 to 2830;

Parameter	<u>2827</u> <u>#M3T</u>	<u>2828</u> <u>#M4T</u>	<u>2829</u> # M9T	<u>2830</u> ∳M10T	<u>Units</u>
T-Lead	670.	660.	550.	505.	mg/kg

All test procedures are in accordance with <u>Methods For Chemical Analysis of Water and Wastes</u>, 1983, USEPA, and <u>Standard Methods for The Examination of Water and Wastes</u>, 16th Edition, APHA.

Sincerely yours, ENVIRONMENTAL CONTROL LABORATORY, INC.

Rick Beckenhauer



LABORATORY, INC.



August 28, 1987

Mark Fuchs Roberts/Schornick & Associates 860 Copperfield Drive, Suite A Norman, Oklahoma 73072

Dear Mr. Fuchs:

The following are test results for samples submitted to our laboratory for analysis on 08/10/87:

Laboratory Log # 1666

Turner Brothers Trucking Co.

Sample Number: #2609 to 2636; P.O. # LB-21

<u>Parameter</u>	<u>2609</u> ≸AMF2T	<u>2610</u> #AMF3T	<u>2611</u> #AMFBD2	<u>2612</u> #AMFBD1	<u>2613</u> #AMFF4T	<u>Units</u>
T-Lead	609.	617.	424.	985.	446.	mg/kg
<u>Parameter</u>	2614 ₩	<u>2615</u> #AMF1T	<u>2616</u> ≢AMFBD3	<u>2617</u> ≢PC12T	<u>2618</u> ∦ PC16T	<u>Units</u>
T-Lead	516.	891.	622.	403.	278.	mg/kg
<u>Parameter</u>	<u>2619</u> ≢PC4T	2620 #PC13	<u>2621</u> #PC9T	<u>2622</u> #PC5T	<u>2623</u> ≢PC18T	<u>Units</u>
T-Lead	294.	362.	734.	526.	213.	mg/kg
<u>Parameter</u>	<u>2624</u> #PC10T	<u>2625</u> # PC6T	<u>2626</u> ≢PC15T	<u>2627</u> #PC11T	<u>2628</u> #PC7T	<u>Units</u>
T-Lead	582.	170.	267.	269.	256.	mg/kg
<u>Parameter</u>	<u>2629</u> ≢PC3T	<u>2630</u> ≢PC8T	<u>2631</u> #PC1T	<u>2632</u> #PC19T	<u>2633</u> ≢PC14T	<u>Units</u>
T-Lead	70.	165.	260.	280.	316.	mg/kg
Parameter	<u>2634</u>	2635	<u>2636</u> ≢PC20T			<u>Units</u>
T-Lead	<u>#PC2T</u> 242.	<u>#PC17T</u> 230.	286.			mg/kg

Continued on Page 2

Page 2 Laboratory Log # 1666 Roberts/Schornick August 28, 1987

All test procedures are in accordance with <u>Methods For Chemical Analysis of Mater and Wastes</u>, 1983, USEPA, and <u>Standard Methods for The Examination of Water and Wastes</u>, 16th Edition, APHA.

Sincerely yours, ENVIRONMENTAL CONTROL LABORATORY, INC.

Rick Beckenhauer



PO. BOX 274 • NORMAN, OKL HOMA 73070 • (405) 364-4282

PETROPHYSICAL DATA, LTD. PROJECT NO. SUB FILE NO.

August 10, 1987

Mark Fuchs
Roberts/Schornick & Associates
860 Copperfield Drive, Suite A
Norman, Oklahoma 73072

Dear Mr. Fuchs:

The following are test results for samples submitted to our laboratory for analysis on 07/29/87:

Laboratory Log # 1629

Turner Brothers Trucking Co.

Sample Number: #2442 to 2457;

<u>Parameter</u>	2442 442T	<u>2443</u> #M1T	2444 #M7T	2445 #M6T	<u>2446</u> ∦ M5T	<u>2447</u> # S3T	<u>Units</u>
T-Lead	<u>#M2T</u> 247.	118.	358.	165.	179.	1192.	mg/kg
Parameter	<u>2448</u> ≢S2T	2449 #S1T	2450 #S7T	<u>2451</u> #HP11G	<u>2452</u> #HP4G	<u>2453</u> #HP1 <u>G</u>	<u>Units</u>
T-Lead	1402.	2432	358.	54.	72.	70.	mg/kg
<u>Parameter</u>	2454 4UD150	<u>2455</u> #HP20G	<u>2456</u> ≢HP23G	<u>2457</u> #M8T			<u>Units</u>
T-Lead	<u>#HP15G</u> 5.	202.	1.5	638.			mg/kg

All test procedures are in accordance with <u>Methods For Chemical</u>

<u>Analysis of Water and Wastes</u>, 1983, USEPA, and <u>Standard Methods</u>

<u>for The Examination of Water and Wastes</u>, 16th Edition, APHA.

Sincerely yours,
ENVIRONMENTAL CONTROL LABORATORY, INC.

Rick Beckenhauer

P.O. BOX 274 • NORMAN, OKLAHOMA 73070 • (405) 364-4282

ENVIRONMENTAL CONTROL LABORATORY, INC.

PETROPHYSICAL DATA, LTD.

PROJECT NO. 87015 SUB FILE NO.

July 27, 1987

Mark Fuchs
Roberts/Schornick & Associates
860 Copperfield Drive, Suite A
Norman, Oklahoma 73072

Dear Mr. Fuchs:

The following are test results for samples submitted to our laboratory for analysis on 07/09/87:

Laboratory Log # 1578

Turner Brothers Trucking Co.

Sample Number: #2240 to 2303;

<u>Parameter</u>	<u>2240</u> #WT3T	<u>2241</u> #WT4T	<u>2242</u> #WT25T	<u>2243</u> #WT5T	<u>2244</u> #WT6T	<u>2245</u> #WT7T	<u>Units</u>
T-Lead	65.	195.	823.	523.	87.	890.	mg/kg
<u>Parameter</u>	<u>2246</u> #WT8T	<u>2247</u> #WT9T	<u>2248</u> #WT10T	<u>2249</u> #WT11T	<u>2250</u> #WT12T	<u>2251</u> #WT15T	Units
T-Lead	1810.	90.	143.	37.	N.A.	2810.	mg/kg
<u>Parameter</u>	<u>2252</u>	2253	<u>2254</u> #WT18T	<u>2255</u> #WT19T	<u>2256</u> #WT20T	<u>2257</u> #WT22T	<u>Units</u>
T-Lead	#₩T16T 392.	#WT17T 106.	218.	380.	32.	50.	mg/kg
<u>Parameter</u>	2258 *HT26T	2259	2260	2261 44T21T	<u>2262</u> #WT13T	2263	<u>Units</u>
T-Lead	#WT26T 1,570.	<u>#WT28T</u> 68.	<u>#WT30T</u> 350.	#WT31T 701.	714.	<u>#₩T14T</u> 263.	mg/kg
<u>Parameter</u>	2264	2265	2266 #UT32T	<u>2267</u> #WT33T	<u>2268</u> #WT34T	<u>2269</u> #WT35T	<u>Units</u>
T-Lead	<u>#WT23T</u> 1,380.	<u>#WT24T</u> 790.	<u>#WT32T</u> 2490.	81.	261.	2580.	mg/kg
<u>Parameter</u>	2270	2271 401-201	2272	2273 *UT45T	2274 #UT46T	2275	<u>Units</u>
T-Lead	#WT37T 1200.	<u>#WT38T</u> 804.	<u>#WT39T</u> 130.	<u>#₩T45T</u> 570.	<u>#WT46T</u> 2640.	<u>#₩Т47Т</u> 993.	mg/kg

Continued on Page 2

19

Page 2 Log #1578 July 27, 1987 Roberts/Schornick

<u>Parameter</u>	<u>2276</u> #WT48T	<u>2277</u> #WT41⊤	2278 #WT42T	<u>2279</u> #WT43T	<u>2280</u> ∌WT44T	<u>2281</u> #WT52T	<u>Units</u>
T-Lead	2760.	407.	269.	447.	373.	279	mg/kg
<u>Parameter</u>	<u>2282</u> #WT53T	<u>2283</u> #WT55T	<u>2284</u> ≢WT56T	<u>2285</u> #⊌T57T	<u>2286</u> #WT58T	2287 #WT59T	<u>Units</u>
T-Lead	485.	83.	562.	769.	253.	273.	mg/kg
<u>Parameter</u>	<u>2288</u> #WT60T	<u>2289</u> #WT61T	<u>2290</u> #WT62T	<u>2291</u> #WT63T	<u>2292</u> #WT64T	<u>2293</u> #WT65T	Units
T-Lead	501.	307.	275.	571.	349.	1293.	mg/kg
<u>Parameter</u>	<u>2294</u> #WT66T	<u>2295</u> #₩T2G	<u>2296</u> #WT3G	<u>2297</u> #WT7G	<u>2298</u> #WT14G	2299 #WT22G	<u>Units</u>
T-Lead	355.	13.7	7.1	248.	76	12.	mg/kg
<u>Parameter</u>	<u>2300</u> #WT16G	<u>2301</u> ∌WT49T	2302 F	R <u>2303</u> `#HT518 7	_ NR		<u>Units</u>
T-Lead	11.	469.	23.	833.	•		mg∕kg

All test procedures are in accordance with <u>Methods For Chemical Analysis of Water and Wastes</u>, 1983, USEPA, and <u>Standard Methods for The Examination of Water and Wastes</u>, 16th Edition, APHA.

Sincerely yours, ENVIRONMENTAL CONTROL LABORATORY, INC.

Rick Beckenhauer





PETROPHYSICAL DATA, LTD.

July 21, 1987

Mark Fuchs
Roberts/Schornick & Associates
860 Copperfield Drive, Suite A
Norman, Oklahoma 73072

Dear Mark:

The following are test results for soil samples submitted to our laboratory for analysis on 07/14/87:

Laboratory Log # 1599

P.O. # LB-6

Sample Number: #2352/S5T; #2353/S4T; #2354/S8T;

#2355/S6T; #2356/Dg1T;

<u>Parameter</u>	<u>2352</u>	<u>2353</u>	<u>2354</u>	Units
T-Lead	461.0	596.0	173.0	mg/kg
<u>Parameter</u>	<u>2355</u>	<u>2356</u>		<u>Units</u>
T-Lead	1,040.0	993.0		mg/kg

All test procedures are in accordance with <u>Methods For Chemical</u>
<u>Analysis of Water and Wastes</u>, 1983, USEPA, and <u>Standard Methods</u>
<u>for The Examination of Water and Wastes</u>, 16th Edition, APHA.

Sincerely yours, ENVIRONMENTAL CONTROL LABORATORY, INC.

Rick Beckenhauer



ENVIRONMENTAL CONTROL LABORATORY, INC.



PO. BOX 274 • NORMAN, OKLAHOMA 73070 • (405) 364-4282

PETROPHYSICAL DATA.LTD.

July 17, 1987

Mark Fuchs
Roberts/Schornick & Associates
860 Copperfield Drive, Suite A
Norman, Oklahoma 73072

PROJECT NO. SUB FILE NO.

Dear Mark:

The following are test results for soil samples submitted to our laboratory for analysis on 06/30/87:

Laboratory Log # 1555

Sample Number: #2180/WT12T; #2181/WT27T; #2182/WT29T; #2183/WT21T #2184/WT1T; #2185/WT2T; #2186/WT36T; #2187/WT40T; #2188/WT54T #2196/WT24G; #2197/WT28G; #2198/WT30G;

<u>Parameter</u>	2180	2181	2182	2183	<u>Units</u>
T-Lead	776.2	340.5	95.5	510.0	mg/kg
<u>Parameter</u>	2184	<u>2185</u>	2186	2187	<u>Units</u> .
T-Lead	142.5	205.5	307.5	56.5	mg/kg
<u>Parameter</u>	2188	2196	2197	2198	<u>Units</u>
T-Lead	423.0	287.0	57.5	49.0	mg/kg

All test procedures are in accordance with <u>Methods For Chemical</u>

<u>Analysis of Water and Wastes</u>, 1983, USEPA, and <u>Standard Methods</u>

<u>for The Examination of Water and Wastes</u>, 16th Edition, APHA.

SINCERELY YOURS, ENVIRONMENTAL CONTROL LABORATORY, INC.

Rick Beckenhauer

EXHIBIT 2 Chain of Custody Documentation

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RELINQUISHED BY (SIGNATURE)			RELI	IQUISHE	D TO				DATE	TIME			· · · · · ·
DISPATCHED BY (SIGNATURE) DATE	TIM	E	RECE	VED FO	R LABOR	ATORY (S	IGNATURE	·)	DATE	TIME	LB9		
CARRIER			LABOR	ATORY	E	10	 			<u> </u>	PO # AND SAMPLE I.D. #'S	MUST BE ON T	HE LAB INVOICE
ADDRESS			ADDRE	ss /	VOX	MAN			·		ALL ANALYSIS PERFORMED BY	EPA APPROVE	D PROCEDURES
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PRGJECT PRGJECT							SAMPI	<u> 11 R</u>	M	3	SAMP!	LE		
нате Т	VRNER BROTHERS		Name	ROBE	RTS/S	cttor	NICK	ÉASS DR. S	506.	Soil	П	Groundwater		
Address				Addre	ss /	1000	TO E	D A	00 5	11172	1	☐ Waste		Surface Water
				Signa	ture	2016	CNFI		Dres 3	VIIE	∕ ₹		1I	
	i		1	10	ture		==		5					
SAMPLE I.D.	DESCRIPTION	DATE	TIME	WEAT TEMP		СОМР	GRAB	OTHER	MAN	NO.		ANALYSIS REQUIRED	REMARKS_	
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5 6T						X							,	
D517		, A	- *	(X						*		
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RELINQUI	SHED BY (SIGNATURE)			RELINQUISHED TO							TIME			
DISPATCH	ED BY (SIGNATURE)	DATE TIP	Œ	RECEIVED FOR LABORATORY (SIGNATURE)							TIME	LAB PO #		· · · · · · · · · · · · · · · · · · ·
CARRIER		<u> </u>		LABOR	ATORY		- An	rits		7/14/87		L 36 PO # AND SAMPLE 1.D. #'S	MUST RE ON T	HE TAR THVOTCE
									L	159	9			
ADDRESS			Ţ	ADDRE	ss PRM	AN			•	<i></i>		ALL ANALYSIS PERFORMED B	Y EPA APPROVEL	PROCEDURES
METHOD OF SHIPHENT イレイルリ カドとフレモスモカ					/ \	, , , -	-		!	;	Yes	No. explain ab	pove	
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	PROJECT	SAMPLIN RM SAMPLE	
	Name Turner Brothers Trucking Company, Inc.	Name	ater
	Address Edmond, Oklahoma	Address Norman, Oklahoma Waste Surface	: Water
	,	Signature	
	SAMPLE DATE TIME	WEATHER NO. OF TEMP PREC COMP GRAB OTHER MAN CONTAINERS ANALYSIS REQUIRED REMARKS	
V	WT 12T West Test Arra 7-7 1700		
	W7337 / /		
/ړ.	WT34T		
\checkmark	w7347 ((() () () () () () () () (
V	WT 37		
V	W738 7		
V	w7397		
	w745 T		
/	WT46 T		
	WT47T () 0400	 	
N/	WT48T WOST TOST Arra 7-7 1700 RELINCUISHED BY (SCHATURE)	RELINQUISHED TO DATE TIME ADDITIONAL REMARKS	
	Mark Jucks RELINGUISHED BY (SIGNATURE)	FC L 7-9 DAW DATE TIME	
	RELINQUISHED BY (SIGNATURE)	RELINQUISHED TO DATE TIME	
	DISPATCHED BY (SIGNATURE) DATE TIME	RECEIVED FOR LABORATORY (SIGNATURE) DATE TIME LAB PO #	
	CARRYER	LABORATORY PO # AND SAMPLE I.D. #*S MUST BE ON THE LAB IN	NVOICE
	Roberts/Schornick And Associates	Environmental Control Laboratory ADDRESS ALL ANALYSIS PERFORMED BY EPA APPROVED PROCEDU	URES
i	Norman, Oklahoma	Norman, Oklahoma Yes No. explain above	
	Hand Delivered		

	PROJECT	SAMPLIN ,RM	SAMPLE
	Name Turner Brothers Trucking Company, Inc.	Name	
	Address Edmond, Oklahoma	Address Norman, Oklahoma	Waste Surface Water
		Signature What T	
	SAMPLE I.D. DESCRIPTION DATE TIME	WEATHER	NO. OF CONTAINERS ANALYSIS REQUIRED REMARKS
/	WT41T West Test Arra 7-8 1700	0-	CONTAINERS ANALYSIS REQUIRED REMARKS Total Lead
	WT42T / / / /	/ /	
	wr43T		
l	w7447		
	47527		
/	W753 T		
/	WTSS T		
	WTSET		(')
/	WT57 T		/
v	WT58 T 0900		
✓ <u> </u>	WTS 9 T Was & Tas of Area 7-8 1700 RELINQUISHED BY (SIGNATURE)	, 70° X	ATE TIME ADDITIONAL REMARKS
1	Mark fuels RELINGUISHED BY (SIGNATURE)	ECL :	7-9 09a
]	RELINOUISHED BY (SIGNATURE)		ATE TIME
	DISPATCHED BY (SIGNATURE) DATE TIME		ATE TIME LAB PO #
	CARRYER	LABORATORY	PO # AND SAMPLE I.D. #'S MUST BE ON THE LAB INVOICE
	Roberts/Schornick And Associates ADDRESS	Environmental Control Laboratory ADDRESS	ALL ANALYSIS PERFORMED BY EPA APPROVED PROCEDURES
	Norman, Oklahoma METHOD OF SHIPMENT	Norman, Oklahoma	Yes No. explain above
}	Hand Delivered		

PROJECT			SAMPL	IN RM	j	SAMPLE			
Name Turner Brothers Trucking Company,	, Inc.	Name Roberts/Sc	hornick A	and Associat	es	X Soil	Groundwater		
Address Edmond, Oklahoma		Address Norman, Ok	lahoma			Waste .	Surface Water		
		Signature Mund							
SAMPLE 1.D. DESCRIPTION DATE	E TIME	YEATHER TEMP PREC COM	P GRAB	OTHER MAN	NO. OF CONTAINERS	ANALYSIS REQUIRED	REMARKS		
INTGOT West Test Area 7-	8 1400	90' (0)	<		1	Total head			
V WTG(T / / /	. ,		<i>/</i>		/				
V. WT627 / (1 (
w7637)					,		
VaT64T		(/)							
	1/1				 				
V WT68T		- - - 							
V WTGGT /						-/			
1 a T 2 a					<u> </u>				
V (4736)									
V4776	1					1 /			
WTING West Test Area 7-8 RELINCUISHED BY (SIGNATURE)	1400	90° No X	?		1	Total head			
Mark Full		RELINQUISHED TO			DATE TIME				
RELINQUISHED BY (SIGNATURE)		RELINQUISHED TO)		DATE TIME				
RELINOUISHED BY (SIGNATURE)		RELINQUISHED TO			DATE TIME		•		
	TIME	RECEIVED FOR LA	BORATORY (SI	GNATURE)	DATE TIME	LAB PO #			
CARRIER Roberts/Schornick And Associates		LABORATORY	hal C	-7 Tabassa	<u> </u>	PO # AND SAMPLE I.D. #'S	S MUST BE ON THE LAB INVOICE		
ADDRESS		ADDRESS		ol Laborato	ry	ALL ANALYSIS PERFORMED B	Y EPA APPROVED PROCEDURES		
Norman, Oklahoma HETHOO OF SHIPMENT		Norman, Okl	lahoma			Yes	No. explain above		
Hand Delivered			*		,				

I		PROJECT						SAMPL	_IN R	н			SAMP	 LE	·
	Name Turne	r Brothers Trucking C	ompany,	Inc.	Name Rol		/Scho:			sociat	es	X Soil		Groundwater	
	Address Edmon	d, Oklahoma			Addre		Oklal	ıoma				Waste		Surface Water	
		•			Signa	ature	16								
	SAMPLE				WEAT	HER					NO.	OF			
·	.0.1	DESCRIPTION	DATE	TIME	TEMP	PREC	COMP	GRAB	OTHER	MAN	CONTA	INERS	ANALYSIS REQUIRED	REMARKS	
	VT 497	Work Tost Acra	7-7		900	No	X		ļ. :		/		Total head		
\checkmark	4750T	West Test Acca	7-7	1400	90.	No	X			<u>. </u>	1		Total Land		, en tener e .
V	WT51	West Test Area West Test Area West Test Area	7-7	1400	900	No	Х				1		Total Lord		
														r	
		,											4		······································
											<u> </u>				,
Ī						•	!				<u> </u>				
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		ISHED BY (SIGNATURE)				NOUTSHE					DATE	TIME	ADDITIONAL REMARKS		
,	AMOU VILLAGO	ISHED BY (SIGNATURE)	···		RELI	HOUTSHE	O TO				7-9 DATE	OGOV			
-	ELINOU	ISHED BY (SIGNATURE)			RELI	NOUTSHE	סד ס				DATE	TIME			
	ISPATC	HED BY (SIGNATURE)	ATE TIP	1E	RECE.	IVED FO	R LABOR	ATORY (S)	GNATURE	3	DATE		LAB PO #		,
	ARRIER		<u></u>												
1		ts/Schornick And Assoc	iates			ATORY ironm	ental	Contr	ol Lal	borato	rv		PO # AND SAMPLE I.D. #'S	MUST BE ON	HE LAB INVOICE
þ	DORESS.	an, Oklahoma	······································		ADDRI	55					- <u>T</u>		ALL ANALYSIS PERFORMED B	Y EPA APPROVE	D PROCEDURES
	ETHOO (OF SHIPHENT .			Nor	man,	Oklah	oma		······································	******		Yes	No. explain a	ibove
Į.	Iand I	Delivered												•	

ř -		PROJECT	<u></u>	=:==	_	T .		<u></u>		,			· · · · · · · · · · · · · · · · · · ·	T	<u>. </u>	
Name Turne	Brothers			pany,	Inc.	Name Rob	erts	/Schoi		And As	ssociat	es	<u> </u>	SAMP Soil	LE	Groundwater
Address Edmond	i, Oklahom	a			•	Addre Nor	ess man,	Oklah	noma	-		`		Waste		Surface Water
		•		.,		Signa	iture UU	'ar		4						<u> </u>
SAMPLE	DESCRIPTION			DATE	TIME	WEAT TEMP	THER	сомр	GRAB	OTHER	MAN	NO.		ANALYSIS REQUIRED	REMARKS	
7 16			W		-			ļ				1 4				
VWT22	West West	Test	Acea	7-8	1430	90	No	X						Total Lead		
V W 160	West	1097	Arra	7-8	1445	10.	No	X				1		Total Lead		
	·	P														
							· ·						<u> </u>			
									·			<u> </u>				
RELINGUI	SHED BY (SIGN	ATURE)		<u> </u>			NOUISHE	D TO		<u> </u>	<u> </u>	DATE 7-9	TIME	<u> </u>]	
	ZHEN RI (210H)					RELII	NQUISHE	D 10				DATE	TIME			
RELINQUI	SHED BY (SIGN	ATURE)				RELII	HOUTSHE	סד פ		· · · · · ·		DATE	TIME			•
DISPATCH	ED BY (SIGNATI	UKE)	DATE	111	Æ	RECE	IVED FO	R LABOR	ATORY (S	IGNATURE	=)	DATE	TIHE	LAB PO #		
CARRIER Robert	s/Schornic	k And	Associa	tes			ratory ironu		Contr	ol La	borato	1	<u> </u>	PO # AND SAMPLE I.D. #'S	HUST BE ON T	HE LAB INVOICE
ADDRESS Norma	n, Oklahom		,			ADDRESS Norman, Oklahoma								ALL ANALYSIS PERFORMED B	Y EPA APPROVE	D PROCEDURES
	F SHIPHENT Delivered					!						· · · · · · · · · · · · · · · · · · ·		Yes	No. explain a	bove

	PROGLE,		SAMPLE
	Name Turner Brothers Trucking Company, Inc	Name Roberts/Schornick And Associates	
	Address	Address	C SOIT
	Edmond, Oklahoma	Norman, Oklahoma	Waste Surface Water
		Mark Fut	
		Jan Jack	
•	SAMPLE	WEATHER	NO. OF
	I.D. DESCRIPTION DATE TIME		CONTAINERS ANALYSIS REQUIRED REMARKS
V	WT3T West Tost Arra 7-6 1000		1 Total Lead
V	WTWI (() 1		
/	WT291		
		\ 	
V	w75T) /	/	
V	WT6T		
./	wrnt /) / /		,
1	WT8T		
W	WT9T		
V	WT107 \.		
\checkmark	wint		
	WT12T West Test Arra 7-6 1800 RELINOUISHED BY SSIGNATURES	, 90° NO X	
		RELINQUISHED TO DA	Total Lead Total
	Mark Funds RELYNQUISHED BY (SIGNATURE)	Environmental Control Lab 9 RELINQUISHED TO	-8 100
	THE STATE OF CHARACTER	RELINCUISHED TO DA	TE TIME
	RELINQUISHED BY (SIGNATURE)	RELINQUISHED TO DA	TE TIME
k	DISPATCHED BY (SIGNATURE) DATE TIME	RECEIVED FOR LABORATORY (SIGNATURE) DA	·
		DA	TE TIME LAB PO #
- 1	CARRIER	LABORATORY	PO # AND SAMPLE I.D. #'S MUST BE ON THE LAB INVOICE
	Roberts/Schornick And Associates	Environmental Control Laboratory ADDRESS	
	Norman, Oklahoma	Norman, Oklahoma	ALL ANALYSIS PERFORMED BY EPA APPROVED PROCEDURES
	HETHOO OF SHIPMENT		Yes No. explain above
Ľ	land Delivered		

PROJECT	SAMPLIN RM	SAMPLE
Name Turner Brothers Trucking Company, Inc.	Name	X Soil Groundwater
Address Edmond, Oklahoma	Address Norman, Oklahoma	Waste Surface Water
	Signature Such	
.	mark 2007	
SAMPLE DESCRIPTION DATE TIME	HEATHER NO. OF TEMP PREC COMP GRAB OTHER MAN CONTAINERS	ANALYSIS REQUIRED REMARKS
WT187 West Test Area 7-6 1830		Total hard
WT147 () ((
w7237		
WT247 West Test Acce 7-4 1820	90° No X	Total bead
		Joint Pear-
RECINQUISHED BY (STGNATURE)	RELINQUISHED TO DATE T	THE ADDITIONAL REMARKS
RELINQUISHED BY (SIGNATURE)	Environmental Control Luft 7-8 04 RELINQUISHED TO DATE T	THE
RELINQUISHED BY (SIGNATURE)	RELINQUISHED TO DATE T	THE
DISPATCHED BY (SIGNATURE) DATE TIME	RECEIVED FOR LABORATORY (SIGNATURE) DATE T	(HE LAB PO #
CARRIER	LABORATORY	1 B-4 PO # AND SAMPLE I.D. #'S MUST BE ON THE LAB INVOICE
Roberts/Schornick And Associates	Environmental Control Laboratory ADDRESS	,
Norman, Oklahoma	Norman, Oklahoma	ALL ANALYSIS PERFORMED BY EPA APPROVED PROCEDURES
HETHOO OF SHIPMENT Hand Delivered		Yes No. explain above

	PROJECT						SAMPI	IN R	<u> </u>				. SAMPI	LE	
	Name Turner Brothers Trucking Compar	ny, I	nc.	Name Rol	Name Roberts/Schornick And Associates								Soil		Groundwater
	Address Edmond, Oklahoma			Addre No:	Address Norman, Oklahoma								Wast e		Surface Water
				Signa	Signature										
	SAMPLE			WEAT						, но.			,		
	I.D. DESCRIPTION D		TIHE	TEMP	PREC	COMP	GRAB	OTHER	MAN	CONTA	INERS	ANALYSIS REQU	JIRED	REMARKS	
·y′	WT15 West Test Acea	المسا	1700	90.	No	X						Total	head		
	W7167 /			(1	1				1					province and
\ <u>/</u>	W.T.174			1						1			7		
1		\top	 	7						 				,	
. /	W1 19 \	\rightarrow	(-						 					
7	WT19T	-/	+	\rightarrow						1					
V	WT20T /		-							1		\			
	WT2AT ()									1					*
i./	47267									,					
	WT 187									,					
		-/ 	7							1 ,					**.
	w730 ()	7 07 6	2400							 		-//			
V	WT3/T West Tost Area (7-7	700	70'	HOUTSHI	<i>X</i>				DATE /	TIME	To La L	REMARKS	1	
	Mark Fresh		l	7	06					7-9	0900	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			
	RELINGUISHED BY (SIGNATURE)			ECL 7-9 RELINQUISHED TO DATE							TIME				
	RELINCUISHED BY (SIGNATURE)			RELINQUISHED TO DATE							TIME				
	DISPATCHED BY (SIGNATURE) DATE	TIME	E	RECEIVED FOR LABORATORY (SIGNATURE) DATE							TIME	LAB PO #			
	CARRIER			LABORATORY								60 # 100 61	B-4	ר שוופד פב הע	THE LAB INVOICE
	Roberts/Schornick And Associate	es				nental	l Cont	rol Ta	borato	rv		PU # AND SA!	JULE 1.D. H.S	אט בע וכטא כ	HE TUD INTOICE
	ADDRESS		 	ADDR						-1	 	ALL ANALYSI	S PERFORMED I	BY EPA APPROVI	D PROCEDURES
	Norman, Oklahoma			Nor	man,	Oklah	ioma								
	METHOD OF SHIPMENT Hand Delivered											Yes		No. explain	above
	Traira Delivered		I								ļ				•

-ROJE-LI				SAMP	LIN 3	М	* *	. ;	SAMPI	<u> </u>
me Turner Brothers Trucking Co	Name Roberts	/Scho	rnick 1	And As	sociat	x soit	Groundwater			
idress Edmond Oklahoma		Address Norman,	Oklal	homa			Waste	Surface Water		
	M14.44.00.4 M	Signature	h;	Fue		>				
MPLE DESCRIPTION	DATE TIM	E WEATHER	COMP	GRAB	OTHER	MAN	NO.		ANALYSIS REQUIRED	REMARKS
T12T Contaminated Soil	14		x		J. I. I.		1		Total Lead	
Т27Т	((1		1			,	//	, and the same of
r29T	1/ (1/				17			
r21T	11 11	1/	1				11.			,
T36T			+		İ					
T40T		1								
T54T	11/							· ••••••••••••••••••••••••••••••••••••		
rlt /							1-/			
T2T Contaminated Soil	6-29 16	0 Cloudy	\ \ x				1		Total Lead	
										,-
						<u> </u> 				
LINOU SHED BY (SIGNATURE)		RELINQUIS ECL	IED TO 💥		<u></u>	<u> </u>	DATE 6-30	TIME 1400	ADDITIONAL REMARKS	
LINGUISHED BY (SIGNATURE)		RELINQUIS	ED TO (SIGNATURE	:)		DATE	TIME		
CINQUISHED BY (SIGNATURE)		RELINGUIS	ED TO (SIGNATURE)		DATE	TIME		
SPATCHED BY (SIGNATURE) D)	TIME TIME	RECEIVED	OR LABO	RATORY (S	SIGNATUR	E)	DATE	TIME	LAB PO # LB-4	
RRIER RSA		LABORATOR Environm		Contr	ol Lab	orator	Iу	1	PO # AND SAMPLE I.D. #1	S MUST BE ON THE LAB INVOICE
DRESS Norman, Okla		ADDRESS Norman,	· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·	 ;			ALL ANALYSIS PERFORMED	BY EPA APPROVED PROCEDURES
THOD OF SHIPMENT Hand Delivered		isotman,	CALLUI	Jones					Yes	No. explain above

PROJECT	SAMPLIN RM	SAMPLE
Name Jurner Brother Trucking Co., Inc. Address Edmond, Ok	Name Roberts and Scharnick In	
Address Elmond OK	Name Roberts and Schornick In Address Horman Ole Signature Mark	☐ Waste ☐ Surface Water
	Signature Mark	
SAMPLE I.D. DESCRIPTION DATE TIME	WEATHER COMP GRAB OTHER MAN	NO. OF CONTAINERS ANALYSIS REQUIRED REMARKS
WT17T Soil 6-24 1730	cloudy X	1 Total Lead
штүп ((
итэрт		
47217		/
W7/7 1407-		
WTIT 50:1 6-29 1700	donly X	1 Total Load
		· · · · · · · · · · · · · · · · · · ·
	·	
RELINQUISHED BY (SIGNATURE) RELINQUISHED BY (SIGNATURE)	Environmental Control lab.	ATE TIME ADDITIONAL REMARKS 6-30 ATE TIME
RELINQUISHED BY (SIGNATURE)	RELINQUISHED TO (SIGNATURE)	ATE TIME
DISPATCHED BY (SIGNATURE) DATE TIME RSA CARRIER		ATE TIME LAB PO #
ADDRESS / OK	Environmental Control Lab	PO # AND SAMPLE I.D. #'S MUST BE ON THE LAB INVOICE
METHOD OF SHIPMENT	Morman, OK	THE MINE STATE OF THE STATE OF
Hand delivered		Yes No. explain above

					JAMPE IN IM						SHOPLE			
Hame Turner Brothers Trucking Company, Inc. Address Edmond, Oklahoma														
					Address 860 Copperfield Dr. Ste. A Norman, Okla.						Waste	Groundwater Surface Water		
,					Signature					<u>.</u>			-	
SAMPLE 1.D.	DESCRIPTION		DATE	TIME	VEATHER	СОНР				NO.				
WT24G			6-30	1030	Overcast		GRAB	OTHER	HAN	CONTA	•	ANALYSIS REQUIRED	REMARKS	
	(7	Misting	X	 	<u> </u>		1 1		Total Lead		
WT28G	:) }	<u> </u>		1	Overcast	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \		ļ		5		5 5		
WT30G Contaminated Soil 6-30 1030					1 1		TOtal Lead	:						
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ECTHOUS	SHED BY (STGHATURE)				PEL TUNITEUE	n 10 26								
After the Community (SIGNATURE)					ECL 6					DATE DATE	TIME 460 TIME			
ELTHOUTSHED BY (SIGNATURE)					RELINGUISHED TO (SIGNATURE) DATE T					DATE	TIME			
ISPATCHED BY (SIGNATURE) DATE TIME					RECEIVED FOR LABORATORY (SIGNATURE) DATE TIME					DATE	TIME	LAB PO #		
ARRIER				LABORATORY					ļ					
RSA DURESS				Environmental Control Laboratory						PO # AND SAMPLE I.D. #'S MUST BE ON THE LAB INVOICE LB-4				
Norman, Oklahoma					Norman, Oklahoma						ALL ANALYSIS PERFORMED BY EPA APPROVED PROCEDURES			
ETHOD OF SHIPMENT Hand Delivered				-						Yes N	o. explain above			
											3. Exprain above			

Joan K. Leavitt, M.D. Commissioner

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Board of Health James A. Cox, Jr., M.D. President Linda M. Johnson, M.D. Vice President Robert D. McCullough, II, D.O.

Secretary/Treasurer

Wallace Byrd, M.D. John B. Carmichael, D.D.S. Burdge F. Green, M.D. James L. Henry Walter Scott Mason, ill Ernest D. Martin DEPARTMENT OF HEALTH

OKLAHOMA STATE

P.O. BOX 53551 1000 N.E. TENTH OKLAHOMA CITY, OK 73152

AN EQUAL OPPORTUNIT

53551 TENTH 73152

November 4, 1987

OKO/04 950 524

Mr. Gary Ritzky
Turner Brothers Trucking Company, Inc.
4725 N. Boulevard
Edmond, OK 73034

Dear Mr. Ritzky:

On May 4, 1987 Turner Brothers Trucking, Inc., submitted a revised closure plan for the Edmond Pipe Yard facility. The closure plan was tentatively approved on September 1, 1987 pending public notice. Public notice was published on September 23, 1987 offering opportunity for public comment and/or a public meeting until October 24, 1987. No public comments have been received. On October 19, 1987 Turner Brothers Trucking, Inc., submitted a sampling and analysis report which identified certain areas referred to as "clean zones" which under the closure plan are not subject to closure.

The closure plan for Turner Brothers Trucking Company, Inc., Edmond Pipe Yard facility submitted on May 4, 1987, including the "clean zone" identifications submitted on October 19, 1987 is hereby approved.

Turner Brothers Trucking, Inc., is required to implement the approved closure plan according to the approved closure schedule. Please call John Everett at (405) 271-7066 if you have any questions related to this approval.

Sincerely,

Robert A. Rabatine Programs Manager

Waste Management Service

RAR/JE/lp

Karen Bond, EPA Region VI



TURNER BROS. TRUCKING CO. INC.

P.O. BOX 82929 • 2000 S. MAY AVE. • OKLAHOMA CITY, OK 73148 • (405) 682-6900

September 24, 1987

RECEIVED

SEP 25 1987

Waste Management Service

Mr. John Everett Industrial Waste Division Oklahoma State Department of Health P. O. Box 53551 Oklahoma City, OK 73152

Dear John:

Enclosed is a "Proof of Publication". You should be hearing from Roberts and Schornick by next week concerning the clean area sampling and a request for a letter for the disposal site.

We would like to start removal as early in November as possible. Your cooperation is appreciated.

Sincerely,

Garry M. Ritzky

Personnel & Risk Manager

GMR: jg

Enclosure

cc: Roberts Schornick & Associates

Telephone 235-3100

Courthouse Extension 227

PUBLISHER'S AFFIDAVIT

09-23-87 PUBLIC NOTICE TURNER TRUCKING

PUBLICATION DATE(=)

NUMBER

LEGAL NOTICE

STATE OF OKLAHOMA

SS.

COUNTY OF OKLAHOMA

I, of lawful age, being duly sworn, am a legal representative of The Journal Record of Oklahoma City, Oklahoma, a daily newspaper of general circulation in Oklahoma County, Oklahoma, printed in the English Language and published in the City of Oklahoma City, in Oklahoma County, State of Oklahoma, regularly, continuously and uninterruptedly published in the County for a period of more than 104 consecutive weeks prior to the first publication of the attached notice, and having a paid circulation therein and with admission to the United States mails as second class mail matter and printed in Oklahoma City, Oklahoma County, where delivered to the United States mail.

That said notice, a true copy of which is attached hereto, was published in the regular edition of said newspaper during the period and time of publication and not in a supplement, on the ABOVE LISTED DATE(S).

(Representative Signature)

23

SSP. 1987

Subscribed and sworn to before me this

6.

Notary Public

08-03-91

(08255)
PUBLIC NOTICE OF
CLOSURE PLAN FOR A
CONTROLLED INDUSTRIAL
WASTE FACILITY

In accordance with the Oklahoma Controlled Industrial Waste Disposal Act (63 O.S. 1981) and the Rules and Regulations for Industrial Waste Management (ODH Bulletin 0525), a plan to close a previously used pipe cleaning process and associated residue was submitted to the Oklahoma State Department of Health (OSDH) on May 4, 1987. The operation involved is part of a petroleum industry service firm consisting of, in part, a pipe storage yard where drill pipe is stored and cleaned. The facility is located at Turner Brothers Trucking Company, Inc., 4725. North Boulevard, Edmond, OK, in the El/2 of Section 11, T. 14 N, R. 3 W. I.M., Oklahoma County. The Oklahoma State Department of Health has reviewed the closure plan, determined that it appears to meet regulatory requirements, and now provides notice of tentative approval of the plan. The Department is accepting public comment on the closure plan for thirty (30) days, beginning on September 24th, 1987.

If more specific information is desired, it may be obtained by contacting Mr. Garry Ritzky (405) 682-6900 or by contacting the Director of the Industrial Waste Division, OSDH, at (405) 271-5338, or at the address listed below.

Any person wishing to do so may submit comments on the proposed closure plan during the public comment period. Additionally, any person residing or doing business in Oklahoma may request an informal public meeting to present written or oral views opposing the plan. Such request must be submitted in writing, and must state that the plan is being opposed. Comments and requests for an informal public meeting must be received at the Industrial Waste Division of the Oklahoma State Department of Health, P.O. Box 53551, Oklahoma City, Oklahoma 73152, by the close of business on October 24th, 1987.

The closure plan is on file in Room 803 of the OSDH Building, 1000 N.E. 10th, Oklahoma City, Oklahoma, and may be inspected anytime between the hours of 8:00 a.m. and 4:30 p.m., Monday through Friday, excluding holidays.

RECEIVED

SEP 25 1987

Waste Management Service

Publishers Fee

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My Commission expires:

Joan K. Leavitt, M.D. Commissioner

OKLAHOMA STATE DEPARTMENT OF HEALTH

Board of Health Amma Cara NO Pedan

COM SPANIC MADIL Water Property From DINCLOUP 100 Secury Tresure Wake Byd MD John B. Carrochae, D.D.S. Budge FiGreen MID. AMES LI HEND Water Scott Meson # Emest Di Marsh

P.O. BOX 53551 1000 N.E. TENTH OKLAHOMA CITY, OK 73152

AN EQUAL OPPORTUNI

November 4, 1987

Mr. Gary Ritzky Turner Brothers Trucking Company, Inc. 4725 N. Boulevard Edmond, OK 73034

Dear Mr. Ritzky:

On May 4, 1987 Turner Brothers Trucking, Inc., submitted a revised closure plan for the Edmond Pipe Yard facility. The closure plan was tentatively approved on September 1, 1987 Public notice was published on September 23, 1987 offering pending public notice. opportunity for public comment and/or a public meeting until October 24, 1987. No public comments have been received. On October 19, 1987 Turner Brothers Trucking, Inc., submitted a sampling and analysis report which identified certain areas referred to as "clean zones" which under the closure plan are not subject to closure.

The closure plan for Turner Brothers Trucking Company, Inc., Edmond Pipe Yard facility submitted on May 4, 1987, including the "clean zone" identifications submitted on October 19, 1987 is hereby approved.

Turner Brothers Trucking, Inc., is required to implement the approved closure plan according to the approved closure schedule. Please call John Everett at (405) 271-7066 if you have any questions related to this approval.

Sincerely,

Robert A. Rabatine Programs Manager

Waste Management Service

RAR/JE/Ip

Karen Bond, EPA Region VI

Karen

Joan K. Leavitt, M.D. Commissioner

Board of Health Edward H. Fite, Jr., M.D. President Wallace Byrd, M.D. Vice President Robert D. McCullough, If D.O.

Secretary

John B. Carmichael, D.D.S. James A. Cox, Jr., M.D. Linda M. Johnson, M.D. Ernest D. Martin Walter Scott Mason, III WA. "Tate" Taylor P.O. BOX 53551
1000 N.E. TENTH
OKLAHOMA CITY, OK 73152

SEP 0 4 1987

AN EQUAL OPPORTUNITY EMPLOYER
HAZARDOUS WASTE
PROGRAMS BRANCH

OKO 104 850 524

II. A.4

September 1, 1987

Mr. Gary Ritzky
Turner Brothers Trucking Company, Inc.
4725 N. Boulevard
Edmond, OK 73034

Dear Mr. Ritzky:

A closure plan for Turner Brother's Trucking Company, Inc., Edmond Pipe Yard Facility has been reviewed and is found acceptable. The Department tentatively approves the closure plan pending publication of public notice and opportunity for public comment.

Please provide for publication of the enclosed notice in one area newspaper on one date. The beginning date for public comment should be the day after the date of publication. Please fill in the blanks as appropriate.

When available, please submit a proof of publication to my attention. If you have questions, call me at (405) 271-7066.

Sincerely,

John Everett

Industrial Waste Division

JE/cgh

Enclosure

cc: Karen Bond

EPA Region VI

PUBLIC NOTICE OF CLOSURE PLAN FOR A CONTROLLED INDUSTRIAL WASTE FACILITY

In accordance with the Oklahoma Controlled Industrial Waste Disposal Act (63 O.S. 1981) and the Rules and Regulations for Industrial Waste Management (ODH Bulletin 0525), a plan to close a previously used pipe cleaning process and associated residue was submitted to the Oklahoma State Department of Health (OSDH) on May 4, 1987. The operation involved is part of a petroleum industry service firm consisting of, in part, a pipe storage yard where drill pipe is stored and cleaned. The facility is located at Turner Brothers Trucking Company, Inc., 4725 North Boulevard, Edmond, OK, in the E ½ of Section 11, T 14 N, R 3 W I.M., Oklahoma County. The Oklahoma State Department of Health has reviewed the closure plan, determined that it appears to meet regulatory requirements, and now provides notice of tentative approval of the plan. The Department is accepting public comment on the closure plan for thirty (30) days, beginning on ______, and ending on ______, 1987.

If more specific information is desired, it may be obtained by contacting Mr. Garry Ritzky (405) 682-6900 or by contacting the Director of the Industrial Waste Division, OSDH, at (405) 271-5338, or at the address listed below.

Any person wishing to do so may submit comments on the proposed closure plan during the public comment period. Additionally, any person residing or doing business in Oklahoma may request an informal public meeting to present written or oral views opposing the plan. Such request must be submitted in writing, and must state that the plan is being opposed. Comments and requests for an informal public meeting must be received at the Industrial Waste Division of the Oklahoma State Department of Health, P.O. Box 53551, Oklahoma City, Oklahoma 73152, by the close of business on ______, 1987.

The closure plan is on file in Room 803 of the OSDH Building, 1000 N.E. 10th, Oklahoma City, Oklahoma, and may be inspected anytime between the hours of 8:00 a.m. and 4:30 p.m., Monday through Friday, excluding holidays.

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7.	7. DATE OF EVALUATION COVERED BY THIS REPORT (enter only if different from 5): 85/1/30									
8. AREA AND CLASS OF VIOLATION (enter 'X' in appropriate box if violations found. Enter '0' if no violations found in Area violated.) Class of Violation Area of Violation II										
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•		1	Initials	Date							
	Reviewed HWDMS, agrees with inspection information										
	Reviewed HWDMS, does not agree with inspection information										
	Major/Nonmajor status verified										
	Routing:	Name	Initials	Date							
	1. Enforcement Coordinator	Sam Tafes	<u> </u>	1/14/86							
	2. Compliance Coordinator	<u> 15 </u>		1/17/86							
	3. (If incorrect, return to original	ator <u>)</u>									
	4. J. Hail/ D. French			-							
	5. Enforcement Coordinator	· · · · · · · · · · · · · · · · · · ·									
	 If incorrect, review and return J. Hail/D. French 	to									
	7. M. Burns										
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